

CLARK HILL PLLC
PAOLA M. ARMENI
Nevada Bar No. 8357
Email: parmeni@clarkhill.com
1700 S. Pavilion Center Drive, Suite 500
Las Vegas, Nevada 89135
Telephone: (702) 862-8300
Facsimile: (702) 778-9709
Attorney for Defendant, Dean Romero

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

No. 2:22-cr-00049-JAD-DJA

Plaintiff,

vs.

DEAN ROMERO,

Defendant.

STIPULATION AND ORDER TO CONTINUE SENTENCING
(FIRST REQUEST)

IT IS HEREBY STIPULATED by and between **Dean Romero**, Defendant, by and through his counsel, Paola M. Armeni, Esq., of the law firm of Clark Hill, PLLC, and the Plaintiff, **United States of America**, by and through Jason Frierson, United States Attorney, Joshua Brister, Assistant United States Attorney, and Kimberly Anne Sokolich, Assistant United States Attorney, that the Sentencing in the above-captioned matter, currently scheduled for October 10, 2023, at the hour of 10:00 a.m., be vacated and set to a date and time convenient to the Court but not earlier than 90 days.

This Stipulation is entered into for the following reasons:

1. The current Sentencing date is scheduled for October 10, 2023.
2. Defendant Dean Romero is scheduled for a medical appointment at the end of December.

During that medical appointment, it will be determined if additional follow up will be

needed. To allow for the continuum of medical care prior to Mr. Romero's transport to the Bureau of Prisons, this request is being made.

3. Defendant Dean Romero has appeared in this case, is in custody, and has agreed to a continuance with the government.
4. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, 18 United States Code, Section 3161(h)(1)(D) and Title 18, United States Code, Section 3161(h)(7)(A), when considering the factors under 18 United States Code, Section 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).
5. The additional time requested herein is not sought for purposes of delay and the denial of this request for a continuance could result in a miscarriage of justice.
6. This is the First Request for a continuance of the sentencing date.
7. For all the above-stated reasons, the ends of justice would be best served by the continuance of the sentencing date.

JASON FRIERSON
UNITED STATES ATTORNEY
DISTRICT OF NEVADA

DATED this 4th day of August, 2023.

/s/Kimberly Sokolich
JOSHUA BRISTER
KIMBERLY ANNE SOKOLICH
Assistant United States Attorney
Attorneys for Plaintiff,
UNITED STATES OF AMERICA

CLARK HILL PLLC

DATED this day 4th of August, 2023.

/s/Paola M. Armeni
PAOLA M. ARMENI
Attorney for Defendant,
DEAN ROMERO

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
4
5 Plaintiff,
6 vs.
7 DEAN ROMERO
8 Defendant.

No. 2:22-cr-00049-JAD-DJA

9 **FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER**

10 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
11 Court hereby finds that:

12 **CONCLUSIONS OF LAW**

13 Based on the fact that counsel has agreed to a continuance, the Court hereby concludes that:

- 14 1. The current Sentencing date is scheduled for October 10, 2023.
 - 15 2. Defendant Dean Romero is scheduled for a medical appointment at the end of
16 December. During that medical appointment, it will be determined if additional
17 follow up will be needed. To allow for the continuum of medical care prior to Mr.
18 Romero's transport to the Bureau of Prisons, this request is being made.
 - 19 3. Defendant Dean Romero has appeared in this case, is in custody, and has agreed to a
20 continuance with the government.
 - 21 4. The additional time requested by this Stipulation is excludable in computing the time
22 within which the trial herein must commence pursuant to the Speedy Trial Act, 18
23 United States Code, Section 3161(h)(1)(D) and Title 18, United States Code, Section
24 3161(h)(7)(A), when considering the factors under 18 United States Code, Section
25 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).
 - 26 5. The additional time requested herein is not sought for purposes of delay and the denial
27 of this request for a continuance could result in a miscarriage of justice.
- 28

6. This is the First Request for a continuance of the sentencing date.

7. For all the above-stated reasons, the ends of justice would be best served by the continuance of the sentencing date.

8. The ends of justice are served by granting said continuances and outweigh the best interest of the public and the Defendant's right to a speedy trial, since the failure to grant said continuances would be likely to result in a miscarriage of justice, as it would deny the parties herein sufficient time, and the opportunity, within which to effectively and thoroughly prepare for sentencing taking into account the exercise of due diligence.

ORDER

IT IS HEREBY ORDERED that the sentencing in this matter scheduled for October 10, 2023, at the hour of 10:00 a.m., is hereby vacated and continued to January 16, 2024, at 10:00 a.m.

DATED this 8th day of August, 2023.

UNITED STATES DISTRICT COURT JUDGE
CASE NO.: 2:22-cr-00049-JAD-DJA